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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JAMARKUS PORTER, an individual,

Plaintiff,

v.

AFFORDABLE STRIPING & SEALING,
LLC, a Nevada Limited Liability Company;
DOES I through X, inclusive; ROE
BUSINESS ENTITIES XI through XX,
inclusive,

Defendants.

Case No.: 2:25-cv-01151-GMN-DJA

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR PLAINTIFF
TO RESPOND TO DEFENDANT'S
MOTION TO DISMISS (ECF NO. 6)**

(FIRST REQUEST)

IT IS HEREBY STIPULATED by and between Plaintiff Jamarkus Porter ("Plaintiff"), by and through his respective counsel of record, and Defendant Affordable Striping and Sealing, LLC ("Defendant"), by and through their respective counsel of record, that Plaintiff shall have until July 31, 2025 to file his response to Defendant's Motion to Dismiss. This Stipulation is submitted and based upon the following:

1. On May 30, 2025, Plaintiff filed a Complaint in the Eighth Judicial District Court in Clark County, Nevada asserting claims against Defendant related to his employment. The action

1 was assigned to Presiding Judge Tara Clark Newbury in Department XXI, and assigned case number
2 A-25-920057-C.

3 2. On June 26, 2025, Defendant removed the action to this Court. (*See* ECF No. 1).
4 Thus, Plaintiff must file a Motion to Remand within 30-days of the removal, on or before July 25,
5 2025. (*See* 28 U.S.C. § 1447(c)).

6 3. On July 3, 2025, Defendant filed a Motion to Dismiss Plaintiff's Complaint (the
7 "Motion"). (ECF No. 6). Thus, Plaintiff must file a response to the Motion to Dismiss within 14-
8 days, on or before July 17, 2025. (*See* LR 7-2(b)).

9 4. Due to the timing of Motion immediately before a legal holiday and after the
10 removal, Plaintiff needs additional time to respond to the Motion due to the other filings in this case
11 along with Plaintiff's counsel's deadlines in other cases.

12 5. The Parties have agreed to extend the deadline for Plaintiff to file his response to
13 Defendant's Motion to Dismiss by two-weeks, from July 17, 2025 to July 31, 2025, to allow Plaintiff
14 sufficient time to respond.

15 6. This is the first stipulation to extend the time for Plaintiff to respond to Defendant's
16 Motion to Dismiss.

17 7. The Parties believe these circumstances constitute good cause for granting an
18 extension. *See* Fed. R. Civ. P. 6(b)(1).

19 8. This Stipulation is made in good faith and not for the purpose of delay.

20 **SO STIPULATED.** Dated this 8th day of July, 2025.

21 **GREENBERG GROSS LLP**

LITTLER MENDELSON, P.C.

22 /s/ Marian L. Massey

/s/ Taylor A. Buono

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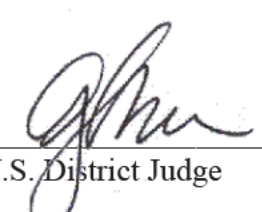
Las Vegas, Nevada 89113

Las Vegas, NV 89135

25 *Attorneys for Plaintiff Jamarkus Porter*

Attorneys for Defendant Affordable Striping & Sealing

27 **IT IS SO ORDERED.** Dated this 8 day of July, 2025.

28 
U.S. District Judge

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